### EXHIBIT 2

Notice

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

	)
In re	) Chapter 9
CITY OF DETROIT, MICHIGAN	) Case No.: 13-53846
Debtor.	) Hon. Steven W. Rhodes
	)

#### NOTICE OF MOTION AND OPPORTUNITY TO RESPOND

PLEASE TAKE NOTICE that on June 18, 2014, the Debtor, City of Detroit, filed its *Motion For Entry of a Protective Order Striking Syncora's Demand in Its Rule 30(b)(6) Deposition Notice for the Personal Financial Information of All City Retirees* (the "Motion") in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") seeking entry of an order striking one of the deposition topics identified by Syncora in its notice of deposition of the City of Detroit pursuant to Fed. R. Civ. P. 30(b)(6).

PLEASE TAKE FURTHER NOTICE that <u>your rights may be</u> <u>affected</u> by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the Debtor's Motion, or you want the Bankruptcy Court to consider your views on the Motion, within **17 days**<sup>1</sup> you or your attorney must:

<sup>&</sup>lt;sup>1</sup> Concurrently herewith, the City has filed a motion seeking to shorten the notice period and expedite the hearing, if any, on the Motion. If that motion is granted, the Court will enter an order on the docket specifying the new deadline to respond to the Motion.

1. File a written objection or response to the Motion explaining your position with the Bankruptcy Court electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:<sup>2</sup>

#### **United States Bankruptcy Court**

211 West Fort Street Detroit, Michigan 48226

You must also serve a copy of any objection or response upon:

#### **Jones Day**

51 Louisiana Ave. NW Washington, D.C. 20001-2113 Attention: Gregory Shumaker

-and-

#### **Pepper Hamilton LLP**

Suite 1800, 4000 Town Center Southfield, Michigan 48075 Attn: Robert Hertzberg and Deborah Kovsky-Apap

2. If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

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<sup>&</sup>lt;sup>2</sup> A response must comply with Fed. R. Civ. P. 8(b), (c) and (e).

Dated: June 18, 2014 Respectfully submitted,

/s/ Deborah Kovsky-Apap
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# ATTORNEYS FOR THE CITY OF DETROIT